

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

STATE OF MISSOURI, *et al.*,
Intervenor-Plaintiffs,

v.

U.S. FOOD AND DRUG ADMINISTRATION, *et al.*,
Defendants,

and

DANCO LABORATORIES, LLC,
Intervenor-Defendant.

Case No. 2:22-cv-00223-Z

**GENBIOPRO, INC.'S MOTION FOR LEAVE
TO PROCEED WITHOUT LOCAL COUNSEL**

By separate motion, GenBioPro, Inc. ("GenBioPro") has sought leave to intervene as a Defendant in this action. Pursuant to Fed. R. Civ. P. 7, GenBioPro respectfully moves the Court under Local Rule 83.10(a) to waive the requirement to obtain local counsel who resides or whose principal office is in this district and located within 50 miles of the courthouse.

Good cause exists to grant GenBioPro's request. GenBioPro's counsel, Christopher M. Odell, is a member of the State Bar of Texas and the bar of this Court and maintains an office at 700 Louisiana Street, Suite 4000, Houston, Texas. Mr. Odell is familiar with the Local Rules of this Court and available to attend hearings called by the Court on short notice. In addition, this Court has issued eight Rule 83.10(a) waivers in this case to date. *See* ECF No. 94 (granting seven motions by amici for leave to proceed without local counsel); ECF No. 154 (granting Intervenor-Plaintiffs' motion to proceed without local counsel).

For the foregoing reasons, GenBioPro respectfully requests that this Motion be granted.

Dated: February 25, 2025

Respectfully submitted,

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** Pro hac vice forthcoming*

Counsel for GenBioPro, Inc.

CERTIFICATE OF CONFERENCE

I certify that on February 24, 2025, counsel for GenBioPro conferred with counsel for Plaintiffs and Defendants about the relief sought by this motion. The Federal Defendants take no position on the motion. Intervenor-Defendant Danco Laboratories, LLC does not oppose the motion. Counsel for Intervenor-Plaintiffs did not respond with its position in time for this filing.

/s/ Christopher M. Odell
Christopher M. Odell

CERTIFICATE OF SERVICE

I certify that on February 25, 2025, I electronically filed the foregoing Motion for Leave to Proceed Without Local Counsel using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties of record.

/s/ Christopher M. Odell
Christopher M. Odell